

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

Larry Reid, et al.,

Plaintiffs,

— vs —

Darryl Moore.,

Defendant.

Case No. 1:21-cv-00991

Judge James S. Gwin

Supplemental Declaration in Support of  
Plaintiffs' Motion to Enforce Settlement  
Agreement

On December 22, 2021, Plaintiffs Larry Reid and Larry Reid Live LLC filed a Motion to Enforce (ECF No. 29) the Settlement Agreement concluded by the Parties just days earlier. The Plaintiffs did so on the bases of several breaches of the Settlement Agreement that occurred on the day it became effective and the following day.

In an Order (ECF No.31) entered on December 28, 2021, the Court instructed the Defendant to file a Response to that Motion on or before January 4, 2022.

In the week since the pending Motion was filed, additional events have occurred which bear upon the violation of the Settlement Agreement by the Defendant.

The Plaintiffs hereby respectfully submit an additional declaration by Plaintiff Larry Reid, outlining those events, and do so now in order that the Defendant might have the attached declaration at hand while drafting his Response.

The new information set forth in the attached Second Declaration of Larry Reid may be briefly summarized:

- The nineteen videos listed in the Motion to Enforce have not been removed from YouTube but instead have had their status changed to “private,” which indicates they are still available to persons invited to view them or provided with a link by Moore.<sup>1</sup>

---

<sup>1</sup> Second Reid Decl., at ¶¶ 4–5.

- Moore posted a new video about Reid on December 23, 2021, a transcript of which is being submitted with the attached Declaration, and;<sup>2</sup>
- Moore posted another video with content involving Reid on December 24, 2021, in which he had guests on the video state Reid's name while he made accusations and false statements while saying he could not say his name online.<sup>3</sup>

Plaintiffs respectfully submit this evidence to inform the Court that Moore continues to violate the Settlement Agreement.

Respectfully submitted

/s/ Raymond V. Vasvari, Jr.

**Raymond V. Vasvari, Jr. (0055538)**

vasvari@vasvarilaw.com

**K. Ann Zimmerman (0059486)**

zimmerman@vasvarilaw.com

**VASVARI | ZIMMERMAN**

20600 Chagrin Boulevard

Suite 800 Tower East

Shaker Heights, Ohio 44122-5353

Telephone: 216.458.5880

Telecopier: 216.302.3700

Attorneys for the Plaintiffs

---

<sup>2</sup> Id., at ¶¶ 6–7,

<sup>3</sup> Id., at ¶ 8.

**– Certificate of Compliance –**

The undersigned certified that this document complies with the requirement of L. R. Civ. 7.1(f) in that, exclusive of appendices, each of the statement checked below is true;

- It relates to a dispositive motion and is not longer than fifteen (15) pages;
- It relates to a dispositive motion in a case designated as on the expedited track, and is not longer than ten (10) pages;
- It relates to a dispositive motion in a case designated as administrative or standard track, or in a case not yet given a differentiated case management track designation, and is not longer than twenty (20) pages;
- It relates to a dispositive motion in a case designated as on the complex track, and is not longer than thirty (30) pages;
- It relates to a dispositive motion in a case designated as on the mass tort track, and is not longer than forty (40) pages;
- It exceeds fifteen (15) pages in any event, and it thus contains a brief statement of the issue(s) to be decided, a brief statement of the argument(s) made, and tables of both contents and of the authorities cited therein.

Respectfully submitted

/s/ Raymond V. Vasvari, Jr.

/s/ K. Ann Zimmerman

**Raymond V. Vasvari, Jr. (0055538)**

vasvari@vasvarilaw.com

**K. Ann Zimmerman (0059486)**

zimmerman@vasvarilaw.com

**VASVARI | ZIMMERMAN**

One of the attorneys for

Dated: Cleveland Heights, Ohio, 31 December 2021

**– Certificate of Service –**

The foregoing was filed today, Friday, December 31, 2021, via the Court Electronic Filing System. Service will be made upon counsel of record by, and copies of this filing may be obtained through operation of the CM / ECF System.

Respectfully submitted

/s/ Raymond V. Vasvari, Jr.

/s/ K. Ann Zimmerman

**Raymond V. Vasvari, Jr.** (0055538)

vasvari@vasvarilaw.com

**K. Ann Zimmerman** (0059486)

zimmerman@vasvarilaw.com

**VASVARI | ZIMMERMAN**

One of the Attorneys for Plaintiffs